

Marc E. Kasowitz  
 David M. Friedman  
 Adam L. Schiff  
 Christine A. Montenegro  
 Matthew B. Stein  
 KASOWITZ, BENSON, TORRES & FRIEDMAN LLP  
 1633 Broadway  
 New York, New York 10019  
 (212) 506-1700

*Attorneys for Plaintiff-Appellant*

**UNITED STATES BANKRUPTCY COURT  
 SOUTHERN DISTRICT OF NEW YORK**

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In re:	:	Chapter 11
	:	
LIGHTSQUARED INC., <i>et al.</i> , <sup>1</sup>	:	Case No. 12-12080 (SCC)
	:	
	:	Jointly Administered
Debtors.	:	
	:	
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	:	
HARBINGER CAPITAL PARTNERS LLC, HGW US	:	
HOLDING COMPANY LP, BLUE LINE DZM CORP.,	:	
AND HARBINGER CAPITAL PARTNERS SP, INC.,	:	
	:	
Plaintiffs,	:	
	:	
LIGHTSQUARED LP, LIGHTSQUARED INC.,	:	
LIGHTSQUARED INVESTORS HOLDINGS INC.	:	
TMI COMMUNICATIONS DELAWARE	:	Adv. Case No. 13-01390 (SCC)
LIMITED PARTNERSHIP, LIGHTSQUARED GP INC.,	:	
ATC TECHNOLOGIES, LLC, LIGHTSQUARED CORP.,	:	
LIGHTSQUARED INC. OF VIRGINIA,	:	

<sup>1</sup> The debtors in these chapter 11 cases, along with the last four digits of each debtor's federal or foreign tax or registration identification number, are: LightSquared Inc. (8845), LightSquared Investors Holdings Inc. (0984), One Dot Four Corp. (8806), One Dot Six Corp. (8763), SkyTerra Rollup LLC (N/A), SkyTerra Rollup Sub LLC (N/A), SkyTerra Investors LLC (N/A), TMI Communications Delaware, Limited Partnership (4456), LightSquared GP Inc. (6190), LightSquared LP (3801), ATC Technologies, LLC (3432), LightSquared Corp. (1361), LightSquared Finance Co. (6962), LightSquared Network LLC (1750), LightSquared Inc. of Virginia (9725), LightSquared Subsidiary LLC (9821), Lightsquared Bermuda Ltd. (7247), SkyTerra Holdings (Canada) Inc. (0631), SkyTerra (Canada) Inc. (0629) and One Dot Six TVCC Corp. (0040) ("LightSquared").

LIGHTSQUARED SUBSIDIARY LLC,  
SKYTERRA HOLDINGS (CANADA) INC., AND  
SKYTERRA (CANADA) INC.

Plaintiff-Intervenors,

- against-

SP SPECIAL OPPORTUNITIES LLC,  
DISH NETWORK CORPORATION,  
ECHOSTAR CORPORATION,  
CHARLES W. ERGEN, SOUND POINT CAPITAL  
MANAGEMENT LP, AND STEPHEN KETCHUM,

Defendants.

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**NOTICE OF MOTION OF HARBINGER CAPITAL PARTNERS, LLC  
(A) FOR LEAVE TO APPEAL AND (B) TO EXPEDITE APPEAL OF CERTAIN ISSUES**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, Declaration of David M. Friedman and the exhibits attached thereto, Harbinger Capital Partners LLC, HGW US Holding Company LP, Blue Line DZM Corp., and Harbinger Capital Partners SP, Inc. (collectively, “Harbinger” or the “Appellant”), by and through its attorneys Kasowitz, Benson, Torres & Friedman LLP, hereby moves the District Court, for an order, pursuant to 28 U.S.C. § 158(a) and Federal Rules of Bankruptcy Procedure 8003(a) and 8019, (A) to grant leave to appeal the *Post-Trial Findings of Fact and Conclusions of Law*, dated June 10, 2014 [Adv. Pro. Dkt. No. 165],<sup>2</sup> and (B) to expedite consideration of the three appellate issues that impact the allowed amount of the claim of SP Special Opportunities, LLC in the Debtors’ bankruptcy

<sup>2</sup> Appellant also appeals from the following non-final orders and decisions previously issued in this adversary proceeding: (i) *Order Granting Motions to Dismiss the Amended Complaint*, dated November 14, 2013 [Adv. Pro. Dkt. No. 65]; (ii) *Memorandum Decision Granting Motions to Dismiss Complaint*, dated November 21, 2013 [Adv. Pro. Dkt. No. 68]; *Order Regarding Motions to Dismiss Lightsquared’s Complaint-In-Intervention and Harbinger’s Second Amended Complaint*, dated December 12, 2013 [Adv. Pro. Dkt. No. 97].

cases. Defendants-Appellees' opposition to the motion is due on or before July 3, 2014, and Plaintiff-Appellant's reply is due on or before July 10, 2014.

Dated: June 19, 2014  
New York, New York

KASOWITZ, BENSON, TORRES  
& FRIEDMAN LLP

/s/ David M. Friedman  
Marc E. Kasowitz (MKasowitz@kasowitz.com)  
David M. Friedman (DFriedman@kasowitz.com)  
Adam L. Shiff (AShiff@kasowitz.com)  
Christine A. Montenegro (CMontenegro@kasowitz.com)  
Matthew B. Stein (MStein@kasowitz.com)  
1633 Broadway  
New York, New York 10019  
Telephone: (212) 506-1700  
Facsimile: (212) 506-1800

*Attorneys for the Plaintiff - Appellant*